

EXHIBIT B

From: [Jay M. Wolman](#)
To: [David Dinielli](#)
Cc: [Rachel Grossman](#); matstevenson@bigskylegal.com; mjr@randazza.com; ecf@randazza.com; [Jim Knoepp](#); [Jessica Lewis](#); [john](#); [denise](#)
Subject: Re: SERVICE OF DOCUMENT - 9:17-cv-50 - Gersh v. Anglin
Date: Friday, July 06, 2018 4:33:39 PM

Dear David,

Thank you for speaking with me just now. As discussed, we will move forward with a motion for protective order.

Sincerely,
Jay Wolman

Jay Marshall Wolman, CIPP/US, Counsel*
Randazza Legal Group, PLLC
100 Pearl Street, 14th Floor | Hartford, CT 06103
Tel: 702-420-2001 | Email: jmw@randazza.com

* Licensed to practice law in Connecticut, Massachusetts, New York and the District of Columbia.

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On Fri, Jul 6, 2018 at 5:26 PM, David Dinielli <David.Dinielli@splcenter.org> wrote:

Jay –

Apologies that I'm just getting back to you. I've been in meetings and calls all day.

I just left you a voicemail to this effect as well: I understand you're in a crunch, but we can't agree to anything beyond a two week extension, so you will have to ask the Court for any extension beyond that. We've both had a long time to anticipate document production, and we know from the preliminary pretrial conference that the Court wants to move this case quickly.

Local Rule 26.3(c)(1) requires that we actually speak by phone before a discovery-related motion is filed, so I have left my cell phone number on your work voicemail.

Best,

David

From: Jay M. Wolman [mailto:jmw@randazza.com]

Sent: Friday, July 06, 2018 1:22 PM

To: David Dinielli

Cc: Rachel Grossman; matstevenson@bigskylegal.com; mjr@randazza.com; ecf@randazza.com; Jim Knoepp; Jessica Lewis; john; denise

Subject: Re: SERVICE OF DOCUMENT - 9:17-cv-50 - Gersh v. Anglin

David,

I left you a voicemail. Two weeks isn't going to be sufficient for us. Part of the problem is Marc, who will be the one working on this overseas, already has other commitments that make this timeframe unworkable.

We don't have deadlines set. The end of August is what is most feasible.

Kindly call me to discuss.

Sincerely,

Jay Wolman

Jay Marshall Wolman, CIPP/US, Counsel*

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On Thu, Jul 5, 2018 at 6:03 PM, David Dinielli <David.Dinielli@splcenter.org> wrote:

Jay –

I appreciate that both sides have worked professionally together in this matter and I hope that we can continue to do so as we proceed. Unfortunately, though, we cannot agree to a sixty-day extension, given the numerous delays we already have experienced in this case. We sought clarification from the judge that the discovery stay was lifted precisely because we think it is important to move this case – which already has been pending for approximately fifteen months – forward expeditiously. We can agree to a modest extension of fourteen days for the responses to our first set of document requests and first set of interrogatories, which I believe would make responses due on July 24, 2018.

Best,

David

From: Jay M. Wolman [mailto:jmw@randazza.com]

Sent: Thursday, July 05, 2018 3:19 PM

To: David Dinielli

Cc: Rachel Grossman; matstevenson@bigskylegal.com; mjr@randazza.com; ecf@randazza.com; Jim Knoepp; Jessica Lewis; john; denise

Subject: Re: SERVICE OF DOCUMENT - 9:17-cv-50 - Gersh v. Anglin

David,

We are working on the written responses, but I am perplexed as to why you might want piecemeal responses. Moreover, the precise wording of the written responses is frequently keyed to production itself, both for RPDs and interrogatories.

For how long are you not hesitant to extension?

Thank you.

Sincerely,

Jay Wolman

Jay Marshall Wolman, CIPP/US, Counsel*

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On Thu, Jul 5, 2018 at 3:23 PM, David Dinielli <David.Dinielli@splcenter.org> wrote:

Jay –

Are you asking for an extension to serve the written responses and also to produce? I'm not sure I understand why meeting with your client is necessary to prepare the written responses. Especially because I expect that you may object to some of the requests, which will require meet and confers and perhaps motion practice, we're hesitant to extend the deadline for the written responses and the production for so long. Can you clarify?

Best,

David

From: Jay M. Wolman [mailto:jmw@randazza.com]

Sent: Thursday, July 05, 2018 1:46 PM

To: Rachel Grossman

Cc: matstevenson@bigskylegal.com; mjr@randazza.com; ecf@randazza.com; David Dinielli; Jim Knoepp; Jessica Lewis; john; denise

Subject: Re: SERVICE OF DOCUMENT - 9:17-cv-50 - Gersh v. Anglin

Dear David, et al.,

We are working on responding to your discovery requests. As you are aware, our client lives abroad and we need to meet with him to assist in responding to the requests. To that

end, we would like your consent to a 60 day extension on the deadline to reply.

Thank you for your consideration.

Sincerely,

Jay Wolman

Jay Marshall Wolman, CIPP/US, Counsel*

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On Thu, Jun 7, 2018 at 7:03 PM, Rachel Grossman <Rachel.Grossman@splcenter.org> wrote:

Counsel,

Please find attached for service Plaintiff's First Set of Interrogatories and First Requests for Production of Documents to Defendant Andrew Anglin. Service is also being completed through U.S. mail.

Thank you,

Rachel Grossman (*she/her/hers*)

Paralegal | Economic Justice, LGBT Rights & Special Litigation

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